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April 7, 2000

Kurt Grunert Environmental Protection Agency 9311 Groh Road Grosse Ile, MI 48138

EPA Region 5 Records Ctr.

Dear Mr. Grunert;

Re: Letts Drop Forge - April 5 meeting

The Detroit Water and Sewerage Department ("Department") wishes to summarize its comments to our discussion of the above referenced facility during the meeting of April 5, 2000. It is our desire to have remedial actions occur to minimize further impact of the Detroit sewer system from the release of PCB and other contaminants from the Letts Drop Forge site.

We therefore request that the following items be considered in finalizing the work plan for the site clean up, and included in the work plan for the facility

- 1. Cleaning of the sewer system servicing the facility which includes at a minimum (See attached schematic sewer drawing):
- (i) Clean and remove all sludge and organic material followed by a powerwash of Catchbasin CB#1, CB #2 and all other catchbasins and sumps inside the company property and the pipes connecting those to the sewer line in the alley south of the facility.
- (ii) Clean and remove all sludge and organic material followed by a powerwash of the alley sewer from the manhole MH #4 at the west end to the outfall at 7'-0" sewer at the east end that runs through the alley west of 18th street including all manholes on it.
- (iii) Clean and remove all sludge and organic material followed by a powerwash of Manhole MH #1 on Jefferson at the south —east corner of the facility and the sewer pipe connecting the manhole to the sewer line in the alley south of the facility.

During the cleaning, reasonable efforts must be taken to prevent any solid or oily residues from being dumped into the Jefferson interceptor. These materials are to be properly disposed of in accordance with US EPA requirements.

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Please be advised that the Sewer cleaning plan shall be subject to approval by both DWSD Industrial Waste Control and DWSD Sewer Maintenance and Repair section.

No liquid or solid waste generated during the sewer cleaning will be allowed to be discharged into the sewer.

- 2. Demolition was discussed as a possible alternative for the site. The Department would require that any plans for demolition recognize that the necessary drainage systems servicing West Jefferson must be restored after completion of the demolition of the facility. Approval from the DWSD will be required for such replacement. These Drainage systems refer to the storm water drainage system (including CB #1, CB #2 and other necessary catchbasin inside the property) which might be damaged or impacted by the demolition work.
- 3. In the event that on-site treatment system is necessary, it must be set up for the removal of PCB and other pollutants from the wastewater to be discharged into Detroit sewer system. The facility will be required to receive approval and a permit from the Industrial Waste Control Division of DWSD prior to any discharge.

We would request that the Department have an opportunity to comment on these issues of the draft work plan to be submitted by the company including the above items may please be provided for our review prior to finalization.

Should you have any questions, please contact Mr. Y. Ahmed at (313) 297-5830.

mtt

Manager, Industrial Waste Control

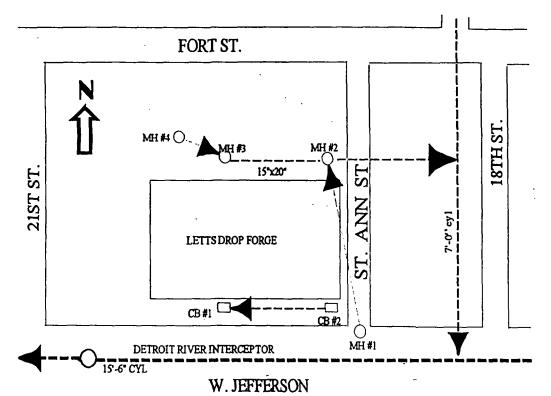
cc:

Y. Ahmed G. Fujita

K. Leavey

J. Heath

File



DRAWING 1